

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

E. ALLEN REEVES, INC.
Plaintiff,

v.

MICHAEL GRAVES & ASSOCIATES, INC.
Defendant.

MICHAEL GRAVES & ASSOCIATES, INC.
Counterclaimant,

v.

E. ALLEN REEVES, INC.
Counterdefendant.

MICHAEL GRAVES & ASSOCIATES, INC.
Third Party Plaintiff,

v.

DAVID CHOU & ASSOCIATES;
KELTER & GILLIGO CONSULTING
ENGINEERS;
FISHER MARANTZ STONE, INC.;
THE ARTS COUNCIL OF PRINCETON;
SAL ARNONE;
JOHN DOES 1-50
Third Party Defendants.

THE ARTS COUNCIL OF PRINCETON
Counterclaimant,

v.

MICHAEL GRAVES & ASSOCIATES, INC.
Counterdefendant.

**APPLICATION FOR CLERK'S ORDER EXTENDING TIME TO
ANSWER OR OTHERWISE MOVE WITH RESPECT TO
MICHAEL GRAVES & ASSOCIATES' AMENDED COUNTERCLAIM**

Pursuant to Local Rule of Civil Procedure 6.1(b), Plaintiff, E. Allen Reeves, Inc.

("Reeves"), by and through its undersigned counsel, hereby applies for a fourteen (14) day

extension of time to answer or otherwise move with respect to Michael Graves & Associates, Inc.'s ("Graves") Amended Counterclaim.

On October 14, 2010, Graves filed its Amended Counterclaim and served the same on Reeves by way of the Court's Electronic Filing System. Reeves' response to Graves' Amended Counterclaim is currently due on Thursday, October 26, 2010. Reeves respectfully requests a fourteen (14) day extension of time to answer or otherwise move with respect to Graves' Amended Counterclaim, through and including Thursday, November 11, 2010. Reeves has not made any previous requests for extensions pursuant to Local Rule 6.1(b).

Respectfully submitted,

**Cohen Seglias Pallas Greenhall &
Furman, PC**

Date: October 26, 2010

By: /s/ John J. Graham, Jr., Esquire
Jason A. Copley, Esquire
John J. Graham, Jr., Esquire
Attorneys for E. Allen Reeves, Inc.

AND NOW, this _____ day of October, 2010, IT IS ORDERED that E. Allen Reeves, Inc. ("Reeves") is granted a fourteen (14) day extension to answer or otherwise move (including motions to dismiss) with respect to Michael Graves & Associates, Inc.'s ("Graves") Amended Counterclaim. Reeves' answer or motion with respect to Graves' Amended Counterclaim shall be filed on or before November 11, 2010.

BY THE COURT

, Clerk

CERTIFICATION OF SERVICE

I hereby certify that a true and correct copy of the foregoing *Application for Clerk's Order Extending Time to Answer or Otherwise Move with Regard to Graves' Amended Counterclaim* was served by electronic filing and facsimile on October 26, 2010 upon:

John H. Osorio, Esquire
Raymond J. Michaud, Esquire
MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN
200 Lake Drive East, Suite 300
Cherry Hill, NJ 08002

John E. Lamastra, Esquire
DALY LAMASTRA & CUNNINGHAM
3 Mountain View Road
P.O. Box 1622
Warren, NJ 07061

Kevin M. Bothwell, Esquire
THOMPSON, BECKER & BOTHWELL, LLC
10 Melrose Avenue
Woodcrest Pavilion
Suite 100
Cherry Hill, NJ 08003

Joanna P. Piorek, Esquire
WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER, LLP
33 Washington Street
Newark, NJ 07102

Glen D. Kimball, Esquire
Michael S. Soule, Esquire
O'CONNOR KIMBALL, LLP
51 Haddonfield Road, Suite 330
Cherry Hill, NJ 08002

By: /s/ John J. Graham, Jr., Esquire
John J. Graham, Jr., Esquire
Attorneys for E. Allen Reeves, Inc.